



Leon Howard <lhowardiii@gmail.com>

Eppie v. EPD, Pacheco

3 messages

Mark Basham <mbasham@bbpcnm.com>
To: leon@lawoffice-lh.com

Tue, Dec 2, 2014 at 9:23 AM

Morning Leon. Our responses to your discovery are due on the 9th. We were just informed that officer Pacheco is on indefinite emergency medical leave (due to his father's health). Rather than request an extension we are going to note this fact in our responses and indicate that we will supplement our responses as soon as he returns to work. If you want to handle it differently let me know.

Mark A. Basham, Esq.

BASHAM & BASHAM, P.C.

2205 Miguel Chavez Road, Ste A
Santa Fe, NM 87505

(505) 988-4575

(505) 992-6170 fax

mbasham@bbpcnm.com

Leon Howard <leon@lawoffice-lh.com>
Reply-To: leon@lawoffice-lh.com
To: Mark Basham <mbasham@bbpcnm.com>
Cc: Joachim Marjon <jmarjon@gmail.com>

Wed, Dec 3, 2014 at 11:21 AM

Hi Mark,

I am sensitive to Officer Pacheco's need to help care for his father. The only portion of your proposal that makes me a little uncomfortable is the indefinite nature of Officer Pacheco's leave from work and how exactly this correlates to responding to discovery. I am fine with a note as to which answers will be supplemented, but do you think we can agree to have the supplemental answers 30 days from December 9th?

Please do not take this message as unsympathetic, I just want to make sure that an indefinite period does not turn into forever.

I note Plaintiff's responses to Defendants' discovery as due today, and I will be getting those out to you today.

Take care



Leon F. Howard III

The Law Office of Lucero & Howard, LLC
20 First Plaza, Suite 515, Albuquerque, NM 87102
Mailing: PO Box 25391, Albuquerque, NM 87125
(505) 225-8778
fax: (505) 288-3473
leon@lawoffice-lh.com
www.lawoffice-lh.com

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Mark Basham <mbasham@bbpcnm.com>
To: leon@lawoffice-lh.com
Cc: Joachim Marjon <jmarjon@gmail.com>

Wed, Dec 3, 2014 at 12:54 PM

Yes I will agree to the 30 days from 12/9.

Mark A. Basham, Esq.

BASHAM & BASHAM, P.C.
(505) 988-4575
(505) 992-6170 fax

mbasham@bbpcnm.com

From: lfhowardiii@gmail.com [mailto:lfhowardiii@gmail.com] **On Behalf Of** Leon Howard
Sent: Wednesday, December 03, 2014 11:21 AM
To: Mark Basham
Cc: Joachim Marjon
Subject: Re: Eppie v. EPD, Pacheco

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